

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

George MANDARAKAS

Case: 2:23-mj-30505

Assigned To : Unassigned

Assign. Date : 12/28/2023

Description: RE: GEORGE  
MANDARAKAS (EOB)

Case No.

## CRIMINAL COMPLAINT

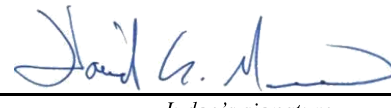
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 1, 2023 - December 25, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1201

Attempted Kidnapping

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: December 28, 2023City and state: Detroit, Michigan  
*Complainant's signature*Special Agent Paul Staso - FBI*Printed name and title*  
*Judge's signature*Honorable David R. Grand, U.S. Magistrate Judge*Printed name and title*

## **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Paul J. Staso, being duly sworn, depose and state as follows:

### **INTRODUCTION**

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2020 and am currently assigned to the Violent Crime Squad in the Detroit Division of the FBI. I have investigated federal violations concerning crimes of violence and firearms. I have gained experience through training and everyday work related to these types of investigations. I have personally investigated or assisted other law enforcement officers in their investigations of crimes of violence. Prior to becoming a Special Agent, I was employed as federal police officer in Quantico, Virginia.

2. The information set forth in this affidavit is based on my review of information from other law enforcement agents and investigators, witnesses, and individuals with knowledge of this matter; my investigation; my review of documents, photographs, and videos; and information gained through my training and experience. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each

and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that George MANDARAKAS (D.O.B. XX/XX/1987) violated 18 U.S.C. § 1201 (attempted kidnapping).

### **PROBABLE CAUSE**

3. The FBI is investigating George MANDARAKAS for suspected violations of 18 U.S.C. § 1201 (kidnapping and attempt to commit the same). A person violates 18 U.S.C. § 1201 when he or she travels interstate and kidnaps, or attempts to kidnap, another person.

4. MANDARAKAS met AV-1 at the University of Notre Dame in 2019. MANDARAKAS claimed to be a student at the University. They had a relationship that lasted for four and half years.

5. On or around October 1, 2023, AV-1 found out that MANDARAKAS was lying to her about his age. She told him she did not wish to continue their relationship or to have further any more contact with him. Around October 1, 2023, MANDARAKAS drove from his home in New Jersey and stayed at a hotel in Trenton Michigan. During this time MANDARAKAS sent numerous text messages and attempted to call AV-1 multiple times. Ultimately, AV-1 agreed to see

MANDARAKAS in a park, where she again told him multiple times that she did not wish to have any further contact with him. As AV-1 attempted to walk to her vehicle, MANDARAKAS blocked her path. AV-1 pushed MANDARAKAS out of the way and was able to get her driver's door shut. MANDARAKAS attempted to grab a hold of the vehicle and did not let go until AV-1 started to drive away. MANDARAKAS then attempted to run after the vehicle for a short distance.

6. On November 22, 2023, MANDARAKAS approached AV-1 as she exited the Daybreak Salon in Woodhaven, Michigan. AV-1 did not know how MANDARAKAS could know she was at the Salon, as she had not had contact with him in almost two months. MANDARAKAS wedged his body in between the driver's door so that AV-1 could not shut her driver's. MANDARAKAS attempted to hug and kiss AV-1. AV-1 asked MANDARAKAS to leave her alone multiple times. MANDARAKAS then pulled out a diamond ring and began to propose to AV-1. AV-1 drove away.

7. Later that evening on November 22, 2023, AV-1 was with some friends at the Rivertown Tavern in Trenton, Michigan. AV-1

noticed that MANDARAKAS was standing at the back entrance. AV-1 approached MANDARAKAS and told him he needed to leave.

MANDARAKAS left but later returned wearing a different set of clothing. Friends of AV-1 confronted MANDARAKAS and told him he needed to leave. MANDARAKAS left the Tavern but continued to send AV-1 messages stating that he would not stop until he had her back, and that he was going to marry her.

8. In December of 2023, MANDARAKAS began sending AV-1 gifts in the mail to include a laptop, old clothing, and a Christmas card. On December 23, 2023, AV-1 received a card in the mail from MANDARAKAS that was postmarked from Trenton, Michigan. Later that evening, AV-1 received a missed phone call from an unknown caller, later identified as a friend of MANDARAKAS, named B.V.

9. In a later conversation with law enforcement on December 27, 2023, B.V. stated that he had known MANDARAKAS for approximately 14 years. MANDARAKAS lived with B.V., in California, for approximately a year from 2009 to 2010. B.V. stated they maintained a relationship and spoke at least monthly. B.V. stated around November of 2023, MANDARAKAS started to make odd

statements. B.V. stated on multiple conversations, MANDARAKAS would mention a “Podcast,” where he heard about a guy who kidnapped his girlfriend, took her to Mexico and it all worked out in the end. B.V. told MANDARAKAS not to do anything foolish or he would go to jail, and MANDARAKAS stated that all things were on the table and that he did not care if he went to jail. Also, MANDARAKAS said if he could not be with AV-1, no one can. B.V. stated he received several phone calls from MANDARAKAS around December 22, 2023, when he told B.V. about how he was watching the AV-1’s house, following her vehicle or vehicles he believed AV-1 was in, and looking for a way to “ping” or track her. B.V. told MANDARAKAS to leave before he got into trouble, and then MANDARAKAS stated he contacted AV-1.

10. On December 24, B.V. told AV-1 that he was concerned that MANDARAKAS was going to hurt or kidnap AV-1 and take her to Mexico. B.V. also told AV-1 that MANDARAKAS had told B.V. that MANDARAKAS had been listening to a podcast where a man kidnapped a female and then fled to Mexico.

11. On December 24, 2023, AV-1 contacted a family member, who was a private detective. Based on his training and experience, the

family member suggested searching AV-1's vehicle for any type of tracking device. When AV-1's vehicle was searched, they located on the inside driver's side bumper a white tracking tile tapped to the vehicle with white tape, ostensibly to mask its appearance against the white plastic of the bumper. Photos of the tracking tile are below:



12. On December 25, 2023, AV-1's and family members drove her vehicle with the tracking tile to St. Joseph's Church in Trenton, Michigan. They waited in a different vehicle and watched over AV-1's vehicle. A short while later, MANDARAKAS was observed arriving at the parking lot and circled AV-1's vehicle. He was driving a black Kia Forte bearing Florida license plate QNLC80. Law enforcement later learned that this was a rental car.

13. MANDARAKAS parked the Kia a short distance from the church and walked to the church. MANDARAKAS entered the church and was inside for approximately 20 minutes before he came back out and appeared as if he was checking to see if AV-1's vehicle was still in the lot. MANDARAKAS noticed a police presence in the area and attempted to exit the church in a different direction from which he had come from. MANDARAKAS was stopped by police and questioned as to why he was at the church. He stated he was at that church because his former girlfriend of four years normally attended that church. MANDARAKAS further stated that he had no connections to Trenton, Michigan, besides the former girlfriend. MANDARAKAS was arrested for stalking.

14. MANDARAKAS's rental car was inventory searched per policy by the Trenton Police Department and several concerning items were located. The items consisted of such as a large quantity of US and Canadian currency, multiple cell phones, an additional Spytec GPS magnetic tracking device, a map of times and distance to sail from Florida to Cuba, and a map to sail from New Jersey to Morocco. Also found was a supply list to include supplies for water, food, antibiotics,



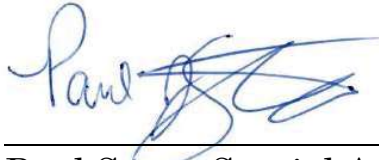
changing name to ‘Josh Tulls’ or ‘Tully’, a satellite phone, and not activating the phones until “on the run and left other phone behind.” A key to a Hyundai and a rental slip from Hertz rental car in Woodhaven were also located in the vehicle.

15. Law enforcement also located MANDARAKAS’s registered vehicle, a Hyundai Elantra, bearing New Jersey license plate VVJ20M, in the vicinity of the Hertz Car Rental, located at 23955 Allen Road, Woodhaven, Michigan. Law enforcement then obtained a state search warrant for MANDARAKAS’s registered Hyundai Elantra. Law enforcement then executed the search warrant on December 26, 2023. Located in the MANDARAKAS’s registered Hyundai Elantra were a firearm, ammunition, handcuffs, rope, a knife, a stun gun, field dressing kit, and a tarp with the shipping tag addressed to MANDARAKAS at his New Jersey residence.

**CONCLUSION**

16. Based on the foregoing, there is probable cause to believe that George MANDARAKAS has violated 18 U.S.C. § 1201 (attempted kidnapping).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Paul Staso", written over a horizontal line.

Paul Staso, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
and/or by reliable electronic means

A handwritten signature in blue ink, appearing to read "David R. Grand", written over a horizontal line.

Honorable David R. Grand  
United States Magistrate Judge

December 28, 2023